

1 Lead Plaintiffs Oklahoma City Employee Retirement System and Police Retirement
2 System of St. Louis (together, “Lead Plaintiffs”), by and through their counsel, and Defendants
3 Pivotal Software, Inc., Robert Mee, Cynthia Gaylor, Paul Maritz, Michael S. Dell, Egon Durban,
4 William D. Green, Marcy S. Klevorn, Khozema Z. Shipchandler, Morgan Stanley & Co. LLC,
5 Goldman Sachs & Co. LLC, Citigroup Global Markets Inc., Merrill Lynch, Pierce, Fenner &
6 Smith Incorporated, Barclays Capital Inc., Credit Suisse Securities (USA) LLC, RBC Capital
7 Markets, LLC, UBS Securities LLC, Wells Fargo Securities LLC, Keybank Capital Markets Inc.,
8 William Blair & Co., LLC, Mischler Financial Group, Inc., Samuel A. Ramirez & Co., Inc.,
9 Siebert Cisneros Shank & Co., LLC, and Williams Capital Group, L.P (collectively,
10 “Defendants”) stipulate as follows:

11 A. On November 8, 2019, the Court entered an order appointing Lead Plaintiffs.
12 ECF No. 63.

13 B. On February 11, 2020, Lead Plaintiffs filed their amended complaint (the
14 “Complaint”). ECF No. 75.

15 C. On July 21, 2020, the Court granted Defendants’ motion to dismiss the Complaint
16 with leave to amend (the “Dismissal Order”). ECF No. 100.

17 D. Lead Plaintiffs have decided not to amend the Complaint and to seek dismissal of
18 the litigation with prejudice.

19 E. Lead Plaintiffs agree not to appeal the Dismissal Order.

20 F. No consideration has been given, offered, or promised to Lead Plaintiffs or their
21 counsel in connection with this dismissal.

22 THEREFORE, the parties, by and through their counsel, hereby agree as follows:

23 1. The above-captioned action be, and hereby is, dismissed with prejudice pursuant to
24 Federal Rule of Civil Procedure 41(a)(1) with each party to bear its own attorney’s
25 fees and costs.

26 2. Pursuant to the Private Securities Litigation Reform Act, each party and each attorney
27 representing any party has complied with the requirements of Rule 11(b) of the
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1 Federal Rules of Civil Procedure as to all complaints, responsive pleadings, and
2 dispositive motions. 15 U.S.C. § 78u-4(c)(1).

3 In connection with this stipulated dismissal, the Parties respectfully request that all dates set in
4 this matter be vacated and taken off the Court's calendar.

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7 **IT IS SO STIPULATED**

8 Dated: September 14, 2020

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Respectfully submitted,

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/s/ Carol C. Villegas

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Inc., William Blair & Co., LLC, Mischler
Financial Group, Inc., Samuel A. Ramirez & Co.,
Inc., Siebert Cisneros Shank & Co., LLC, and
Williams Capital Group, L.P. (the latter two, SWS)*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

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3 DATED: September 15, 2020

A handwritten signature in black ink, appearing to be 'C. Breyer', is written over a horizontal line.

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5 Honorable Charles R. Breyer
6 United States District Judge
7 Northern District of California
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